

**ATTACHMENT B-1:**

**PLAINTIFFS' LIST OF GENERAL QUESTIONS FOR VOIR DIRE**

1. Have any of you or a family member ever been employed in the law or a law-related field?
2. Have you ever appeared as a witness in a trial? If so, please answer: What kind of case? Where and when?
3. Are you or a close friend or family member a blogger or social media personality?
4. Which social media platforms do you use regularly?
5. Have you or anyone in your immediate family ever been harassed online or cyber-bullied?
6. Have you ever been publicly portrayed in a manner that was untrue or misleading or accused of doing something that you did not do?
7. Have you or a member of your immediate family ever been disciplined at school or work for posts you or they have made on social media?
8. Have you or a member of your immediate family ever had to discipline another person for their posts on social media?
9. Do you have strong feelings (positive or negative) about defamation law?
10. Do you believe that a person should be able to say whatever they wish about another person, even if what they say is false or disparaging?
11. Do you or have you in the past followed defamation cases in the news (such as the Alex Jones case or the Johnny Depp case)?
12. Do you follow political discussions on social media?
13. Do you regularly post on social media platforms about politics?

14. Do you believe that people on social media platforms are silenced for supporting conservative politics?
15. Have you ever had a serious dispute with family members because of your political views expressed on social media?
16. If you were sitting at one of these two tables, is there any reason why you would not want yourself as a juror in this case?
17. Is there anything that we covered too quickly that you would like to provide more information about?
18. Is there anything else that you feel is important for the parties in this case to know about you?
19. Do you have any knowledge of the incident involving Nicholas Sandmann that occurred in Washington DC at the Lincoln Memorial in 2019?